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Defendants.

DEFENDANT I.Q. DATA INTERNATIONAL, INC.'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

CASE NO. 2:21-cv-02050-GMN-DJA

Defendant I.Q. Data International, Inc. ("IQD"), by and through its attorneys of Gordon Rees Scully Mansukhani, LLP, respectfully moves for an unopposed extension of time to file its answer or otherwise responsive pleading to Plaintiff's Complaint. In support, IQD states as follows:

- 1. On November 15, 2021, Plaintiff filed a Complaint against IQD (alongside the other three Defendants), generally alleging that IQD violated the Fair Credit Reporting Act, 15 U.S.C § 1681 *et seq.* ("FCRA").
- 2. On November 18, 2021, IQD was served with Plaintiff's Complaint, making its responsive pleading deadline December 9, 2021.

- 4. On December 10, 2021, Defense Counsel for IQD contacted counsel for Plaintiff, who subsequently agreed to provide IQD with an extension of time through and including January 12, 2022, in which to answer or otherwise plead.
- 5. IQD expects that a 30-day extension in which to answer or otherwise plead will be sufficient to fully address the issues raised in Plaintiff's Complaint.
- 6. This motion is not brought to unduly delay these proceedings or to harass any party to this case.

 WHEREFORE, IQD respectfully requests this Honorable Court grant it an extension of time, up to and including January 12, 2022, to file its responsive pleading to Plaintiff's Complaint, in the absence of any opposition and because good cause exists.

Respectfully submitted,

s/Joshua Y. Ang

Sean P. Flynn, Esq. Joshua Y. Ang, Esq.

GORDON REES SCULLY MANSUKHANI, LLP

300 S. 4th Street, Suite 1550

Las Vegas, NV 89101

Telephone: (702) 577-9300 Facsimile: (702) 255-2858 Email: sflynn@grsm.com jang@grsm.com

Dated: December 23, 2021

IT IS SO ORDERED:

This unopposed motion of Defendant, I.Q. Data International, Inc., for an extension of time, up to and including January 12, 2022 to file its answer or otherwise responsive pleading, is hereby GRANTED.

UNITED STATES MAGISTRATE JUDGE

Dated: January 3, 2022

1 **CERTIFICATE OF SERVICE** 2 I HEREBY CERTIFY that on the 23rd day of December, 2021, and pursuant to Fed. R. 3 Civ. Pro. 5, and to all applicable Local Rules of this Court, I served via CM/ECF and/or 4 deposited for mailing in the U. S. Mail, a true and correct copy of the foregoing 5 DEFENDANT I.Q. DATA INTERNATIONAL, INC.'S UNOPPOSED MOTION FOR 6 AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD was served upon 7 those persons designated by the parties in the E-Service Master List upon the following: 8 George Haines, Esq. 9 Gerardo Avalos, Esq. FREEDOM LAW FIRM 10 8985 S. Eastern Avenue, Suite 350 Las Vegas, NV 89123 11 Telephone: (702) 880-5554 Gordon Rees Scully Mansukhani, LLP Facsimile: (702) 385-5518 12 Email: Ghaines@freedomlegalteam.com 300 S. 4th Street, Suite 1550 gavalos@freedomlegalteam.com Las Vegas, NV 89101 13 Attorneys for Plaintiff: Elsa Assefa 14 Michael Kind, Esq. 15 KIND LAW 8860 S. Maryland Parkway, Suite 106 Las Vegas, NV 89123 16 Telephone: (702) 337-2322 17 Facsimile: (702) 329-5881 Email: mk@kindlaw.com 18 Attorneys for Plaintiff: Elsa Assefa 19 20 /s/Joshua Y. Ang An Employee of GORDON REES 21 SCULLY MANSUKHANI, LLP 22 23 24 25 26 27 28 1256948/63814030v.3